

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2019-185-E

DOCKET NO. 2019-186-E

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In the Matter of:)
South Carolina Energy Freedom)
Act (H.3659) Proceeding to)
Establish Duke Energy Carolinas,)
LLC's Standard Offer, Avoided)
Cost Methodologies, Form)
Contract Power Purchase)
Agreements, Commitment to Sell)
Forms, and Any Other Terms or)
Conditions Necessary (Includes)
Small Power Producers as Defined)
in 16 United States Code 796, as)
Amended) - S.C. Code Ann.)
Section 58-41-20(A),)
and)
)
South Carolina Energy Freedom)
Act (H.3659) Proceeding to)
Establish Duke Energy Progress,)
LLC's Standard Offer, Avoided)
Cost Methodologies, Form)
Contract Power Purchase)
Agreements, Commitment to Sell)
Forms, and Any Other Terms or)
Conditions Necessary (Includes)
Small Power Producers as Defined)
in 16 United States Code 796, as)
Amended) - S.C. Code Ann.)
Section 58-41-20(A))
)

SOUTHERN ALLIANCE FOR CLEAN
ENERGY AND SOUTH CAROLINA
COASTAL CONSERVATION LEAGUE'S
ISSUE LIST FOR COMMISSION
DETERMINATION

Pursuant to the Public Service Commission of South Carolina's ("Commission") Order No. 2019-129-H, Intervenor Southern Alliance for Clean Energy ("SACE") and South Carolina Coastal Conservation League ("CCL") hereby present the following list of issues for Commission determination in these proceedings to implement the requirements of The Energy Freedom Act, Act No. 62 of 2019.

Seasonal Allocation and Resource Adequacy Studies

1. Have intervenors raised a specter of imprudence regarding Duke Energy's proposed seasonal allocation of capacity weightings and the underlying 2016 Resource Adequacy Studies and *Solar Capacity Value Study*?

☐ Yes ☐ No

2. Has Duke Energy met its burden of proof to show its proposed seasonal allocation of capacity weightings (90% winter and 10% summer in DEC, 100% winter in DEP) "fully and accurately" compensate QFs for all avoided energy and capacity costs as required by Act 62 consistent with PURPA?

☐ Yes ☐ No

3. Has Duke Energy met its burden of proof to show its proposed avoided capacity rates "fully and accurately" compensate QFs for all avoided energy and capacity costs as required by Act 62 consistent with PURPA?

☐ Yes ☐ No

4. Is it reasonable and appropriate to require Duke Energy to initiate a transparent stakeholder process for developing future resource adequacy studies, including evaluation of the assumptions and methodology underlying the studies?

☐ Yes ☐ No

5. Is it reasonable and appropriate for Duke Energy to be required to make a compliance filing that recalculates the Companies' proposed avoided capacity rates based on alternative seasonal capacity weightings to "fully and accurately" compensate QFs for all avoided energy and capacity costs as required by Act 62 consistent with PURPA?

☐ Yes ☐ No

6. Is it reasonable and consistent with Act 62 and PURPA for Duke Energy to be required to make a compliance filing that recalculates the Companies' proposed avoided capacity rates based on the seasonal capacity allocation most recently approved by the Commission in its May 4, 2016 directives in Docket No. 1995-1192-E, until such time as a robust stakeholder process has vetted the resource adequacy studies underlying the Companies' proposed seasonal allocation factors?

☐ Yes ☐ No

7. Is it reasonable and appropriate to require Duke Energy to identify and implement cost-effective demand side management programs that address and lower winter peak demand beginning in the year 2020?

☐ Yes ☐ No

Solar Integration Services Charge (SISC)

8. Is the partial settlement agreement regarding Duke Energy's proposed Solar Integration Services Charge ("SISC") entered into by DEC and DEP, JDA, SBA, and SACE and CCL reasonable and consistent with Act 62 and PURPA?

☐ Yes ☐ No